

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	X	
	:	
In re:	:	Chapter 11
	:	
Red River Talc LLC, ¹	:	Case No. 24-90505 (CML)
	:	
Debtor.	:	
	:	
	X	

SECOND SUPPLEMENTAL DECLARATION OF SANDER L. ESSERMAN
[Related to Docket No. 683, 1179, 1180]

1. Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedures (the “*Bankruptcy Rules*”), Sander L. Esserman declares:

2. I am a shareholder of the law firm Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation (“*SBEP*” or “*Firm*”), and I am authorized to make this Declaration on behalf of the Firm.

3. This Second Supplemental Declaration is being provided in support of the Application of the Official Committee of Talc Claimants to Retain and Employ Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, as its Texas Counsel *Nunc Pro Tunc* to October 28, 2024 [D.I. 683] (the “*Application*”) and pursuant to Federal Rules of Bankruptcy Procedure 2016(a) and 2014(a). Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein, and, if called as a witness, would testify competently thereto.

¹ The last four digits of the debtor’s federal tax identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, NJ 08933.

4. This supplemental declaration discloses that on or about March 11, 2025, Stutzman, Bromberg, Esserman & Plifka, P.C. (“SBEP”) was engaged by Baron & Budd, P.C., to provide advice in connection with *In re: Hall Labs, LLC* bankruptcy case pending as case no. 25-21038 in the United States Bankruptcy Court for the District of Utah, Central Division, in connection with non-asbestos related product liability claims. This matter is wholly unrelated to this Chapter 11 case or the Debtor but is being disclosed out of an abundance of caution.

5. SBEP will periodically review its files during the pendency of this case to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, SBEP will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration as required by Bankruptcy Rule 2014(a).

6. Except as specifically disclosed in the Application and all subsequent supplemental declarations, to the best of my knowledge, SBEP does not have any connection with the above-captioned Debtor, its creditors, or any other parties in interest, or their respective attorneys and accountants, or the United States Trustee or any person employed in the office of the United States Trustee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: March 25, 2025, in Dallas, Texas.

/s/ Sander L. Esserman
Sander L. Esserman